

SM

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

MAY 24 2022 *AK*

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

HERNANDES RIES,

Plaintiff,

v.

CITY OF CHICAGO,

Defendant.

Case No.

1:22-cv-02740

Judge Harry D. Leinenweber

Magistrate Judge Jeffrey T. Gilbert

RANDOM

**Complaint**

In support of his complaint against the City of Chicago, the Plaintiff,  
Hernades Ries, *pro se*, states as follows:

1. This complaint is brought pursuant to the Genetic Information  
Nondiscrimination Act of 2008 ("GINA").
2. This complaint alleges a federal cause of action and thus this Court  
has jurisdiction to entertain the claim.
3. The actions giving rise to this complaint all occurred in Cook County,  
Illinois, making venue appropriate in this Court.
4. Ries is employed by the City of Chicago as the Director of  
Administration II with the Chicago Department of Transportation.
5. The City had adopted a policy that requires all employees to notify the  
City of their Covid-19 vaccination status.

6. Ries has not provided this information to the City. As a result, on November 19, 2021, Ries was placed on an unpaid leave from his position with the City and that leave continues.

7. By requiring Ries to provide the City with his Covid-19 vaccination status and conditioning his ability to work on providing such information, the City has violated Ries' rights under GINA.

8. Ries filed a complaint of discrimination alleging that his rights under GINA had been violated with the EEOC.

9. The EEOC issued Ries a right to sue notice on April 12, 2022, and this lawsuit is being initiated within 90 days of his receipt of that notice.

10. As a result of the foregoing Ries has sustained damages. These damages include lost wages and emotional distress injuries.

Wherefore, the Plaintiff, Hernandez Ries, requests that this Court enter judgment in his favor and against the City of Chicago and provide the following relief:

1. An award of lost wages.
2. An award of emotional distress damages.
3. Order an immediate reinstatement to his position of employment.
4. Order any indication of his suspension to be removed from his personnel file.
5. Find that the policy of the City of Chicago requiring that employees submit their Covid 19 vaccination status violates GINA.

6. Any other relief that is appropriate.

Hernades Ries,

By: /s/ Hernandes Ries  
*Pro Se*

Hernandes Ries  
8645 S. Calumet Avenue  
Chicago, Illinois 60619  
Telephone: 773-802-336  
Email: hries10@yahoo.com